

Alkesh Parikh & Vrushali Khadilkar

July 9, 2006

RE: Business Opportunity Rule, 16 CFR Part 437

Dear Sir / Madam,

We have been Independent Business Owners affiliated with Quixtar Inc. since it's launch in September 1999. We were Amway distributors prior to that. We've been able to supplement our job income with the income from our business affiliated with Quixtar, very well. Besides supplemental income, we've also been able to help other people with good quality products and an opportunity to better their life using this business opportunity and this has been very fulfilling.

We'd like to make following suggestions in reference to the proposed FTC rule about conducting our business.

1. **Prospects would have to wait seven days after receiving disclosures before they could register.**

In our business, we do not force people to register immediately, then why should we force them to wait for seven days?? In addition to that, after registering also, we offer money back guarantee for first six months; so really, new business owners have up to six months to make up their mind anyway!!

The waiting period should be eliminated and it should be left to prospect to decide when to start.

2. **You would be required to give every prospect a list of "references" – the names, addresses, and phone numbers of 10 other IBOs in the area – seven days before the prospect registers.**

The prospect always has the opportunity to meet other IBOs at the meetings and training programs organized for the education of IBOs (even before registering and of course after registering as well). If he wishes to get the references, he can get their contact details himself. Also, by giving him contact information of other IBOs, we have the risk of us doing the work of showing the opportunity to the prospect and they joining somebody else (especially if the prospect finds out that he knows the "Reference" IBO from before).

This requirement should not be there.

3. **You would have to give every prospect a list of all lawsuits, arbitrations, and other legal claims for the past 10 years involving Quixtar *and its IBOs* where the plaintiff *alleged fraud*, misrepresentation, or unfair trade practices – *regardless of whether or not the accusation was true.***

We encourage all the prospects to do their own research and get their facts right!! But just like, when we take admission in a school, the school is not required to disclose information about all the students who did not graduate (or committed suicide for that matter) for whatever reason, this requirement should not be there for our business too! The same thing is true when we accept a job position with a company; the company is not required to disclose any legal proceedings against them to the new person who has just joined the company!

This requirement should not be there.

4. **You would have to make a different disclosure for every income claim.**

When the prospect decides to become an IBO, he gets a lot of information about different income levels by Quixtar. Also, the literature that we loan out to prospects mentions the average monthly gross income for 'active' IBOs. We also mention average income of different levels in the business in our presentation flip chart!!

5. **You would be required to provide prospects with personal financial documents to back up ("substantiate") any income claim.**

We have the personal financial documents but we should not be required to show it to anybody other than Government agencies. Also, prospects have access to average incomes of different levels in the business.

Overall, the business opportunity powered by Quixtar is the best business opportunity in our opinion and we believe in giving the right information to the potential IBOs. This business opportunity will enhance anybody's lifestyle who takes advantage of it and although we appreciate FTC proposing these requirements in order to banish any fraudulent schemes we would like to request FTC to keep the rules simple and the business opportunity, easily accessible to people for their own benefit.